

### REMARKS/ARGUMENTS

These remarks are made in response to the Office Action of February 15, 2005 (Office Action). This response is filed after the 3-month shortened statutory period along with an appropriate fee.

In paragraph 1 of the Office action, claim 10 was rejected under 35 U.S.C. § 102(b) as being anticipated by IBM Disclosure No. NNRD41868 entitled (Marking Locations in Material Dictated Into a Speech Recognition System" (IBM-NNRD41868). In paragraph 2, claims 1-5, 9, 11-15, and 19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,909,667 to Leontiades, *et al.* (Leontiades) in view of U.S. Patent No. 4,914,704 to Cole, *et al.* (Cole) and IBM-NNRD41868. In paragraph 3, claims 6-8 and 16-18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Leontiades in view of Cole and IBM-NNRD41868 and in further view of the publication entitled "Mastering Microsoft Office 2000 Professional Edition", by Courter, *et al.* (Courter).

In response to the Office Action, Applicants have clarified their invention by amending the independent claims. Specifically, claims 1, 10, and 11 have been amended to clarify what is meant by a correction cursor and insertion cursor and to clarify how they are utilized within the claimed invention. Support for these amendments can be found at page 10, lines 1-13, in FIG 3, between pages 12, lines 14 and page 15, line 21, and throughout the specification. Claims dependent upon these independent claims have been amended for semantic correctness with their amended independent claim.

Claims 2 and 12 have been amended to emphasize that the insertion cursor is automatically relocated from to the location of the located portion of text, before the substitution of text occurs, as supported by page 14, lines 1-12. Claims 3 and 13 have been amended to maintain semantic consistency with the independent claim as amended.

No new matter results from these amendments.

In light of the amendment, the cited art fails to anticipate or render the claimed invention obvious, which should be apparent from a brief overview of the invention as claimed and of each of the cited references.

#### **The Applicant's claimed invention**

The Applicants claimed invention provides an enhancement to speech recognition systems that makes it easier and more natural for a user to correct speech recognition errors as the user dictates text. The invention establishes two independent cursors, associating one with a text insertion function and another with a speech correction function. The cursors are automatically established in accordance with established rules and do not require explicit user placement. For example, the correction cursor (associated with the speech correction function) can be placed at the end of the text segment where the last speech correction occurred. In another example, the insertion cursor (associated with the text insertion function) can be automatically moved to the location of the correction cursor when the system is in correction mode (performing a speech correction function) and can be automatically moved to the end of the text when the system is placed in a dictation mode (associated with the text insertion function).

#### **IBM-NNRD41868 fails to teach each claimed limitation**

I IBM-NNRD41868 teaches that a user can establish multiple textual cursors using speech commands (set mark or clear mark) and can navigate to and from the user established cursors using a navigation command (go to mark). IBM-NNRD41868 fails to teach associating specific cursors with specific speech recognition functions or speech recognition modes. IBM-NNRD41868 only teaches that cursors are established at user specified locations or at statically defined default location. IBM-NNRD41868 fails to teach that established cursors can be automatically moved from one location to another without user intervention based upon speech recognition operations.

Claim 10 stands rejected as being anticipated by IBM-NNRD41868. Applicants have shown how IBM-NNRD41868 fails to explicitly or inherently teach each claimed limitation of claim 10. Accordingly, the 35 U.S.C. § 102(b) rejection to claim 10 should be withdrawn, which action is respectfully requested.

**Leontiades fails to cure the deficiencies of IBM-NNRD41868**

Leontiades teaches a method for editing text within a speech dictation system. In the teachings of Leontiades, a plurality of words are contained within correction window. Particular ones of these words can be highlighted. A user spoken utterance can uniquely identify one of the highlighted words that is to be edited. The identified word can then be corrected by voice commands.

The use of the correction window provides an alternative mechanism to the Applicants' claimed invention for correcting or editing text using a speech-enabled application. Leontiades relies upon a completely different architecture (correction window and highlighting) than the Applicants claimed invention.

Leontiades fails to teach associating specific cursors with specific speech recognition functions or speech recognition modes. Leontiades does discuss both an editing mode and a dictation mode, but does not teach that multiple cursors are to be utilized or that unique cursors are to be established for each mode. Leontiades fails to teach that multiple established cursors can be automatically moved from one location to another without user intervention based upon speech recognition operations. Again, Leontiades only teaches one cursor (the active location) and conventionally moves the active cursor to a location at where a user is performing an action.

**Cole fails to cure the deficiencies of Leontiades and IBM-NNRD41868**

Cole teaches that tokens are to be generated and associated with speech converted text words and speech recognized punctuation when a speech recognition engine using a

speech recognition dictionary and associated rules identifies a spoken utterance. The tokens can hold information on character count, capitalization, and left and right concatenation of an associated item. The tokens can be stored in an editor. The tokens can be utilized when formatting, editing, or printing text.

The use of tokens (containing a character count, capitalization info, right and left concatenation information) is a fundamentally different approach to enhance conventional speech recognition systems than that taken by the Applicants. Applicants note that a cursor is a system maintained item for performing user manipulations within an application at a cursor specified location. The tokens of Cole are data storage mechanisms stored within a document that contain metadata about an associated item (word or punctuation). A cursor and a token are dissimilar in structure and purpose.

Cole fails to teach that a speech-enabled system should utilize more than one simultaneously maintained cursors. Sometimes the activities occurring at the location of the active cursor relate in some fashion to tokens (token information can be used when performing a task at the active cursor location or token information can be modified when a task is performed at the active cursor location). Cole fails to teach that different cursors should be associated with different speech recognition functions or modes. Cole fails to teach that multiple established cursors can be automatically moved from one location to another without user intervention based upon speech recognition operations. Cole only teaches one cursor (the active location) and conventionally moves the active cursor to a location at where a user is performing an action. Cole does not appear to provide teachings relevant to the Applicants' claimed invention.

Claims 1-5, 9, 11-15, and 19 stand rejected under 35 U.S.C. § 103(a) based upon Leontiades in view of IBM-NNRD41868 in further view of Cole. Applicants have show that none of these references alone or in combination explicitly or implicitly teach each of the claimed limitations. Accordingly, the 35 U.S.C. § 103(a) rejections to claims 1-5, 9, 11-15, and 19 should be withdrawn, which action is respectfully requested.

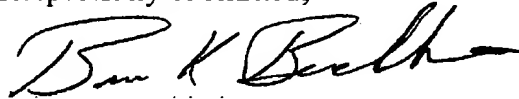
**Courter fails to cure the deficiencies of Leontiades and IBM-NNRD41868**

Specifically, Courter fails to teach that a speech-enabled system should utilize more than one simultaneously maintained cursors. Courter fails to teach that different cursors should be associated with different speech recognition functions or modes. Courter fails to teach that multiple established cursors can be automatically moved from one location to another without user intervention based upon speech recognition operations.

Claims 3, 6-8, and 16-18 stand rejected under 35 U.S.C. § 103(a) based upon Leontiades in view of IBM-NNRD41868 in further view of Courter. Applicants have show that none of these references alone or in combination explicitly or implicitly teach each of the claimed limitations. Accordingly, the 35 U.S.C. § 103(a) rejections to claims 3, 6-8, and 16-18 should be withdrawn, which action is respectfully requested.

The Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. The Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,



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